

Presentment Date: January 11, 2019

Objection Deadline: January 10, 2019 at 5:00 PM (AST)

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

Re: ECF Nos. 4012, 4221

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO

Debtor.

PROMESA

Title III

No. 17 BK 3283-LTS

**NOTICE OF PRESENTMENT OF STIPULATION
REINSTATING AND MODIFYING AUTOMATIC STAY BETWEEN
THE COMMONWEALTH OF PUERTO RICO AND LUZ PIZARRO-CORREA**

PLEASE TAKE NOTICE that on October 4, 2018, Luz Pizarro-Correa (the “Movant”) filed an *Urgent Motion for Relief from Stay to Continue Employment Discrimination Case* [ECF No. 4012] (the “Motion”) seeking relief from the Title III Stay to allow Movant to continue the

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

case captioned *Luz Pizarro-Correa v. ELA*, Civil No. 16-2598, (the “Prepetition Action”) pending before the District Court.

PLEASE TAKE FURTHER NOTICE that on October 18, 2018, in accordance with the Court’s scheduling order [ECF No. 4017], the Commonwealth filed an *Objection of the Commonwealth to Urgent Motion to Continue Employment Discrimination Case filed by Luz Pizarro-Correa* [ECF No. 4063] arguing that Movant failed to establish cause to justify the lifting of the Title III Stay to allow the Prepetition Action to proceed.

PLEASE TAKE FURTHER NOTICE that on November 13, 2018, the Title III Court entered an *Order Terminating Urgent Motion for Relief from Stay to Continue Employment Discrimination Case* [ECF No. 4221] finding that the Title III Stay terminated on November 3, 2018, pursuant to 11 U.S.C. § 362(e)(1), making no determination as to the merits of the Motion and without prejudice to the Debtor’s ability to make an application to this Court seeking other appropriate relief.

PLEASE TAKE FURTHER NOTICE that Commonwealth and Movant met and conferred and, in lieu of the Commonwealth seeking other appropriate relief to reinstate the Title III Stay, the parties have agreed to reinstate the Title III Stay in accordance with the terms of the *Stipulation Reinstating and Modifying Automatic Stay Between the Commonwealth of Puerto Rico and Luz Pizarro-Correa*, attached hereto as **Exhibit A** (the “Stipulation”).²

PLEASE TAKE FURTHER NOTICE that the Commonwealth does not agree with the assertions contained in the Motion, and that the Stipulation does not operate as a waiver or modification of the reinstated Title III Stay so as to permit the prosecution against the

² The Financial Oversight and Management Board for Puerto Rico, as the Debtors’ representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act*, has authorized the Department of Justice to file this Notice on behalf of the Commonwealth.

Commonwealth or any of the other Title III debtors of any claim or claims by anyone other than Movants as provided for in the Stipulation, and Commonwealth reserves all rights, defenses, and protections with respect to any matters pending or that may arise in the Title III cases or otherwise.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the Stipulation is filed with the Court in accordance with the Case Management Procedures by **no later than 5:00 p.m. (AST) on January 10, 2019**, no hearing will be held and the Stipulation may be approved.

PLEASE THAT FURTHER NOTICE that copies of the Stipulation and all documents filed in these Title III cases are available (a) free of charge by visiting <https://cases.primeclerk.com/puertorico> or by calling +1 (844) 822-9231, and (b) on the Court's website at <http://www.prd.uscourts.gov>, subject to the procedures and fees set forth therein.

Dated: January 4, 2019
San Juan, Puerto Rico

Respectfully submitted,

WANDA VÁZQUEZ GARCED
Secretary of Justice

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EXHIBIT A

Stipulation